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Honorable Judge Samuel J. Steiner
DATE: December 17, 2010
TIME: 9:30 a.m.
Chapter 11
LOCATION: Seattle

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8
9
10 UNITED STATES BANKRUPTCY COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 In re:

14 Adam R. Grossman,

15
16 Debtor.
17

CHAPTER 11 BANKRUPTCY

CASE NO. 10-19817-SJS

18 DECLARATION OF DEBTOR-IN-
19 POSSESSION IN OPPOSITION TO
20 BORODIN'S MOTION FOR ORDER FOR
21 APPOINTMENT OF CHAPTER 11
22 TRUSTEE

23 I, Adam R. Grossman, declare the following:

- 24 1. I am the Debtor in this proceeding.
- 25 2. I no longer oppose the appointment of a trustee in this proceeding.
- 26 3. However, due to acts of the Moving Party in the Motion to Appoint Chapter 11

27 Trustee, Jill Borodin, I cannot comply with the US Trustee's request for the production of
28 documents.

DECLARATION OF DEBTOR-IN-POSSESSION IN
OPPOSITION TO BORODIN'S MOTION FOR ORDER FOR
APPOINTMENT OF CHAPTER 11 TRUSTEE - Page 1 of 2

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1 4. As has been stated many times in our recent dissolution proceeding (King
2 County Superior Court case no. is 09-2-02955-9), some time after I moved out of the family
3 house, Ms. Borodin, without my knowledge or permission either moved or destroyed most if
4 not all of my paperwork on which I could have complied with the US Trustee's request for
5 the production of documents.
6

7 5. Pursuant to a ruling dated Tuesday, December 14, 2010 in the above
8 mentioned dissolution proceeding, I am now divorced from Jill Borodin.

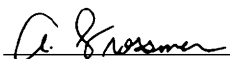
9 6. Furthermore, I am in the final stages of negotiating a job which will provide
10 income that would be a steady source of income to pay my creditors and remedy my
11 financial situation without the need for protection from the bankruptcy court.
12

13 7. I further believe that as the above-mentioned dissolution proceeding has been
14 finalized, my extraordinary costs related to it are now over, thus allowing the funds from the
15 above mentioned job to be applied towards my debts.
16

17 8. Accordingly, as I will not be able to produce the documentation that the US
18 Trustee seeks, I believe that the best course would be for the Court to dismiss this case.
19

20 I declare under penalty of perjury under the laws of the State of Washington that the
21 foregoing statements are true and correct to the best of my information and knowledge.
22

23
24 DATED this 17th day of December, 2010.

25
26 

27 Adam R. Grossman
28 Debtor-in-Possession